

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

**FARMERS TELECOMMUNICATIONS
COOPERATIVE, INC.,**

Plaintiff,

v.

**VERIZON BUSINESS NETWORK
SERVICES INC. and QWEST
COMMUNICATIONS CORPORATION,**

Defendants.

CIVIL ACTION NO. 2:06-cv-00790-WC

**MOTION FOR ORDER ALLOWING THIRTY DAY EXTENSION
WITHIN WHICH TO ANSWER OR OTHERWISE RESPOND TO
THE COMPLAINT AND TO EXTEND THE VARIOUS DEADLINES
SET FORTH IN THE PARTIES' PROPOSED DISCOVERY PLAN**

Defendant Qwest Communications Corporation ("QCC") moves the Court for an order allowing the defendants 30 additional days within which to answer or otherwise respond to the complaint and to extend by 30 days the discovery and various other deadlines set forth in the parties' "Proposed Discovery Plan." In support, QCC states as follows:

1. Since the filing of the complaint in this matter, the parties have been making progress in resolving their disputes without further litigation expense. While it is too soon to accurately predict whether the parties can resolve the dispute without further litigation activities, the parties believe that within 30 additional days they can report to the Court whether the matter can be resolved short of further court action.

2. Undersigned is authorized to represent to the Court that counsel for plaintiff Farmers Telecommunications Cooperative, Inc., and defendant Verizon Business Network Services Inc. join in this request.

WHEREFORE, PREMISES CONSIDERED, Defendant QCC moves the Court for an order allowing the defendants 30 additional days within which to answer or otherwise respond to the complaint and to extend by 30 days the discovery and various other deadlines set forth in the parties' "Proposed Discovery Plan," which was filed on or about January 12, 2007.

Respectfully submitted on this 26th day of January, 2007.

/s Robin G. Laurie

Robin G. Laurie (ASB-4217-U64R)
One of the Attorneys for Defendant Qwest
Communications Corporation
Balch & Bingham LLP
105 Tallapoosa Street
Suite 200
Montgomery, Alabama 36101
Telephone: (334) 834-6500
Fax: (334) 269-3115
Email: rlaurie@balch.com

Leigh Anne Hodge (ASB-1008-E49L)
Balch & Bingham LLP
1710 Sixth Avenue North
Birmingham, Alabama 35203-2015
Telephone: (205) 226-8724
Fax: (205) 488-5698
Email: lhodge@balch.com

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of January, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Jonathan M. Hooks (HOO032)
Mark D. Wilkerson (WIL072)
Dana H. Billingsley (BIL012)
Wilkerson & Bryan, P.C.
P. O. Box 830
405 South Hull Street
Montgomery, Alabama 36101-0830
Telephone: (334) 265-1500
Fax: (334) 265-0319
mark@wilkersonbryan.com
dana@wilkersonbryan.com
jonathan@wilkersonbryan.com

Patrick H. Tate (TAT006)
P. O. Box 680593
Fort Payne, Alabama 35968
Telephone: (256) 845-1047
Fax: (256) 845-1094
phtate@farmerstel.com

Bryan O. Balough (BAL026)
Starnes & Atchison
P. O. Box 598512
Birmingham, Alabama 35259-8512
Telephone: (205) 868-6000
Fax : (205) 868-6099
bob@starneslaw.com

/s Robin G. Laurie
Robin G. Laurie (ASB-4217-U64R)
One of the Attorneys for Defendant Qwest
Communications Corporation
Balch & Bingham LLP
105 Tallapoosa Street
Suite 200
Montgomery, Alabama 36101
Telephone: (334) 834-6500
Fax: (334) 269-3115
Email: rlaurie@balch.com